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Attorneys for Defendant
DON LAWSON

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

DAVID DUTCHER,	Case No. C12-01981 CRB
Plaintiff,	**STIPULATION AND ORDER CONTINUING INITIAL DISCOVERY AND DISPOSITIVE MOTION DEADLINES**
vs.	
DON LAWSON, SUSAN DUTCHER, MARY NOLAN, CHRISTOPHER BUTLER, SHARON TAYLOR, LATASHA WALLACE, JULIA KOSTINA and DOES ONE to FIFTY, inclusive,	
Defendants.	

IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, through their respective counsel of record, as follows:

WHEREAS this civil rights action is currently pending in the above entitled Court.

WHEREAS the parties had previously agreed to an initial discovery schedule and dispositive motion schedule which was confirmed by Your Honor on May 6, 2014, via Order (ECF Doc. 82) ("Order").

WHEREAS the parties have been performing written discovery in this matter since May of 2014.

WHEREAS counsel for the Plaintiff have recently informed defense counsel that they are seeking to withdraw as counsel of record in this case, pursuant to California Rule of Professional

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Conduct 3-700(C) governing the permissive withdrawal of an attorney from the representation of a client. Alternatively, new counsel may substitute in to this case as counsel for Plaintiff.

WHEREAS counsel for Defendant DON LAWSON agreed to give Plaintiff some additional time to respond to key written discovery in light of this potential withdrawal by Plaintiff's current counsel, a delay which has set back follow up discovery and depositions in this case, so the current deadlines set in the Order need to be modified to allow defense counsel a full and fair opportunity to conduct written discovery and take the necessary depositions, and to allow time for Plaintiff and/or his new counsel a full and fair opportunity to conduct written discovery and take the necessary depositions.

WHEREAS the parties have met and conferred in good faith and have agreed to the following modification to the dates set in the Order (ECF Doc. 82) as follows:

- Discovery related to certain dispositive motions will be completed by January 23, 2015.
- Initial dispositive motions will be filed no later than March 13, 2015.
- Hearings on initial dispositive motions will be heard on April 17, 2015.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: September 8, 2014   GEARINGER LAW GROUP

THE SCOTT LAW FIRM

By: __/s/ Gearinger, Brian_____
BRIAN GEARINGER / JOHN HOUSTON SCOTT
Attorneys for Plaintiff DAVID DUTCHER

Dated: September 8, 2014   ROECA HAAS HAGER LLP

By:___/s/ Haas, Edward_____
EDWARD D. HAAS
Attorneys for Defendant MARY NOLAN

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TELEPHONE: (925) 939-5330

Dated: September 8, 2014   MCNAMARA, NEY, BEATTY, SLATTERY,

BORGES & AMBACHER LLP

By: ___/s/ Blechman, Noah_____
JAMES V. FITZGERALD, III
NOAH. G. BLECHMAN
Attorneys for Defendant DON LAWSON

Dated: September 8, 2014   LAW OFFICE OF MATTHEW B. PAVONE

By: _/s/ Pavone, Matthew_____
MATTHEW B. PAVONE
Attorneys for Defendant DON LAWSON

Dated: September 8, 2014   STEELE, GEORGE, SCHOFIELD & RAMOS LLP

By: ___/s/ Steele, Geoffrey_____
GEOFFREY WM. STEELE
Attorneys for Defendant CHRISTOPHER BUTLER

Dated: September 8, 2014   LAW OFFICES OF TIM A. PORI

By: ____/s/ Pori, Tim_____
TIM A. PORI
Attorneys for Defendant SUSAN GOMES

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: September 15, 2014   By: _____

THE HONORABLE _____
United States _____

IT IS SO ORDERED
Judge Charles R. Breyer

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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